Fw: Questions for CSC about Cement Creek Document:

Sabrina Forrest to: barry.hayhurst 01/31/2012 04:56 PM

From: Sabrina Forrest/R8/USEPA/US

To: barry.hayhurst@urs.com

Barry, Just in, but I don't know that you will be needing to spend much time incorporating all this since the site is not being proposed in March. I do need to hear from you on the status of the doc rcd, what your plans are with it, and the TDD issues I left vmail regarding. Talk soon.

Sincerely,

Sabrina Forrest
Site Assessment Manager
U.S. Environmental Protection Agency
1595 Wynkoop Street, Mail Code: 8EPR-B

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----- Forwarded by Sabrina Forrest/R8/USEPA/US on 01/31/2012 04:54 PM -----

From: Katharine Lima <kncj@sbcglobal.net>

To: Maple Barnard/R8/USEPA/US@EPA, Sabrina Forrest/R8/USEPA/US@EPA

Date: 01/31/2012 03:52 PM

Subject: Re: Fw: Questions for CSC about Cement Creek Document:

Good afternoon:

The purpose of this email is to respond to the remaining questions (2, 4 and 6) that Barry posed below for Upper Cement Creek. I apologize again for the delay; the Update priorities have really been keeping us hopping now that we are getting close to the end.

Regarding # 2: I concur that the dissolved aqueous data are the more appropriate for the mine adit sources, both for the sake of consistency and to avoid any potential influence from sediment - I believe some of those samples were collected after the discharge contacted the ground surface, correct?

4: If this discussion is placed after the source summary table, I would recommend definitely also putting it into the Site Description section up front. I also recommend calling it Site Definition instead of aggregation, since the "site" as defined for HRS purposes is composed of the sources and release(s), and that is pretty much what will be described in that section.

6: Scale-wise, I do think the figures seem appropriate.

For Figure 2 - the figure does not appear to have complete source name labels.

For Figure 4 - Only Sources 1 and 2 have the source number on their labels; I recommend putting the numbers on all of them. In addition, the only 15-mile TDL end point that really needs to be labeled is the one 15 miles downstream of the most downstream PPE.

One of the two figures needs to have all of the PPEs marked on it. They would show up better on Fig. 2, but make more sense on Fig. 4, since that is the one the distances are measured on. I recommend numbering the PPEs starting at the most upstream one, and going sequentially downstream.

I hope this information is helpful. Please let me know if you have any additional questions, or if you would like clarification on anything. Thanks.

-Katharine
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--- On Wed, 1/18/12, Maple Barnard < Barnard. Maple @epamail.epa.gov > wrote:

From: Maple Barnard < Barnard. Maple @epamail.epa.gov>

Subject: Fw: Questions for CSC about Cement Creek Document:

To: "katharine lima" <kncj@sbcglobal.net> Date: Wednesday, January 18, 2012, 7:35 AM ----- Forwarded by Maple Barnard/R8/USEPA/US on 01/18/2012 06:34 AM

From: "Hayhurst, Barry" < barry.hayhurst@urs.com>

To: Maple Barnard/R8/USEPA/US@EPA

Date: 01/17/2012 04:31 PM

Subject: Questions for CSC about Cement Creek Document:

Annette, could you please forward these questions to CSC

Here are some small questions for CSC about the Cement Creek Document:

- 1. I noticed that the source sample analytical data in the Sandoval Zinc Co. source tables has been corrected for qualifiers as per the "Using Qualified Data Guidance". I thought that only background and target results were to be adjusted. Should the source data for Cement Creek be adjusted by the Using Qualified Data correction factors?
- 2. The elevated concentrations for the targets are taken from the dissolved aqueous data. Should the mine adit sources be dissolved also. Both dissolved and total is available. I have used dissolved.
- 4. Because mine waste rock sources from Grand Mogul, Mogul, Red & Bonita, and Gold King 7 Level are being combined do I include a discussion before or after the Summary of Source Descriptions Table --is this the appropriate place to discuss the common drainage, common mineralogy, common targets impacted, common weathering, etc. to justify aggregation? I have it after the summary table.
- 5. Should I include Chains of Custody (COCs) for samples from the 2010 SI that are not used in the scoring (i.e. sediment PCB samples).
- 6. Are these Figure designs what you had in mind? Do we need to change anything?

----Original Message----

From: Maple Barnard [mailto:Barnard.Maple@epamail.epa.gov]

Sent: Thursday, January 05, 2012 10:38 AM

To: Hayhurst, Barry

Subject: Fw: Upper Cement Creek, Feedback on Working Revision

Documentation Record

Barry

Sorry for forwarding to the wrong person. Let me know what you think annette

---- Forwarded by Maple Barnard/R8/USEPA/US on 01/05/2012 10:36 AM

From: "Schmelzer, Henry" < henry.schmelzer@urs.com>

To: Maple Barnard/R8/USEPA/US@EPA

Date: 01/05/2012 10:36 AM

Subject: RE: Upper Cement Creek, Feedback on Working Revision

Documentation Record

Annette:

I forwarded your e-mail on Upper Cement Creek onto Barry Hayhurst since I never have worked on the project. No problem.

Henry Schmelzer

From: Maple Barnard [Barnard.Maple@epamail.epa.gov]

Sent: Thursday, January 05, 2012 9:52 AM

To: Schmelzer, Henry

Subject: Fw: Upper Cement Creek, Feedback on Working Revision

Documentation Record

Henry

Please see Katharine's comments

Thank You

---- Forwarded by Maple Barnard/R8/USEPA/US on 01/05/2012 07:52 AM

From: Katharine Lima < kncj@sbcglobal.net>

To: Sabrina Forrest/R8/USEPA/US@EPA, Maple

Barnard/R8/USEPA/US@EPA

Cc: Robert Myers/DC/USEPA/US@EPA, Leslie Meador

<lmeador@mindspring.com>

Date: 01/03/2012 04:47 PM

Subject: Upper Cement Creek, Feedback on Working Revision

Documentation Record

Good afternoon:

Immediately before our last conference call, the Region provided a "working revision" of the HRS documentation record for Upper Cement Creek, which included three revised source descriptions. CSC has conducted an informal review of this document - overall, the presentation of the material appears to be in good shape. Please note that this was not an intensive QA review, and did not include a check of all the reference citations. CSC has some suggestions, as follows.

- Background: A line was included in the "Hazardous Substances Associated with the Source" section of each source description that appeared to inquire whether a background level should be included for comparison with the source samples. For the waste piles and the adit discharges, no background is required. CSC notes that "reference" levels have previously been provided in some cases where samples of waste were used to associate hazardous substances with the source. For example, the HRS documentation record for a Region 8 mining site that was finalized on the NPL several updates ago (Flat Creek IMM) presented published "typical"

levels for metals immediately after the mining waste pile samples. CSC does not necessarily see it as advantageous to use that publication (a USGS professional paper) because some of the published metals levels (in the USGS paper) for surface soils in the area of the Upper Cement Creek site appear to be fairly broad ranges and do not compare favorably with the metals levels in the source waste pile samples.

- Containment: Generally, the written description/justification for the containment value is placed directly into the box with "Release via overland migration and/or flood." This would apply to all sources. For Source 3, it appears that the assigned value may more appropriately be

- 10. If the adit discharge is perennial, this, along with the sample documenting presence of hazardous substances, represents evidence of migration from the source into surface water.
- Hazardous Waste Quantity: For Sources 1 and 2, the areas provided as part of the Tier C, Volume tables are not the same as the areas provided in the Tier D, Area tables. In addition, CSC was unable to reproduce the volume calculations for these two sources as an anticipated revision to the cited reference has not yet been provided.

Please feel free to contact me if you have any questions concerning this transmittal. Thank you.

-Katharine

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